

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SARAH PALIN	:	
	:	
Plaintiff,	:	No. 17 Civ. 4853 (JSR)
	:	
	:	
-against-	:	ECF Case
	:	
	:	
THE NEW YORK TIMES COMPANY and JAMES	:	
BENNET,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF MOTION *IN LIMINE*  
REGARDING CASE MANAGEMENT TECHNIQUES**

PLEASE TAKE NOTICE that Defendants The New York Times Company and James Bennet will file a motion requesting that the Court (1) direct the jurors, upon being seated, to read the editorial *America's Lethal Politics* (the "Editorial") and the corrections to the Editorial subsequently published by The Times, (2) instruct the jury, prior to counsel delivering opening statements, on the key principles of defamation law to be applied in this case, and (3) direct the jury to use a special verdict form in its deliberations. Defendants have served their papers in support of this motion on January 10, 2022 and will file their papers by January 17, 2022, and Plaintiff's answering papers are due on January 17, 2022. Pursuant to Rule 9 of the Court's Individual Rules of Practice, in limine motions are normally resolved on the morning of the first day of trial.

Dated: New York, New York  
January 10, 2022

Respectfully submitted,

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